

FILED 08 JUL '21 16:38 USDC-ORP

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNDER
SEAL

UNITED STATES OF AMERICA

3:21-cr- 226-BR

v.

INDICTMENT

[REDACTED]
[REDACTED]
SHANE ANDERSON and
[REDACTED],

21 U.S.C. § 841(a)(1), (b)(1)(A)(viii),
(b)(1)(A)(i), (b)(1)(A)(ii), (b)(1)(B)(vi)
and 846

Defendants.

Forfeiture Allegation

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT 1

(Conspiracy to Distribute Controlled Substances)
(21 U.S.C. § 841(a)(1), (b)(1)(A)(i, ii & viii), (b)(1)(B)(vi), 846)

Beginning on a date unknown and continuing until the date of this indictment, in the District of Oregon and elsewhere, defendants, [REDACTED]
[REDACTED] SHANE ANDERSON and [REDACTED], did unlawfully and knowingly combine, conspire, confederate and agree with each other and other persons whose identities are known and unknown to the Grand Jury to commit the following objects in violation of Title 21, United States Code, Section 846:

Objects of the Conspiracy

A. **Possession with Intent to Distribute Methamphetamine:** The conspirators agreed to possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A)(viii).

B. **Distribution of Methamphetamine:** The conspirators agreed to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A)(viii).

C. **Possession with Intent to Distribute Heroin:** The conspirators agreed to possess with intent to distribute one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A)(i).

D. **Distribution of Heroin:** The conspirators agreed to distribute one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A)(i).

E. **Possession with Intent to Distribute Cocaine:** The conspirators agreed to possess with intent to distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A)(ii).

F. **Distribution of Cocaine:** The conspirators agreed to distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A)(ii).

G. **Possession with Intent to Distribute Fentanyl:** The conspirators agreed to possess with the intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]) propanamide, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B)(vi).

H. **Distribution of Fentanyl:** The conspirators agreed to distribute 40 grams or more of a mixture or substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]) propanamide, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B)(vi).

MANNER AND MEANS

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

It was part of this conspiracy for certain of the defendants and others to store, transport, and conceal controlled substances.

It was part of this conspiracy for certain of the defendants and others to utilize cellular telephones to further the possession and distribution of controlled substances, and to use coded language to communicate with each other in the course of the conspiracy.

It was part of this conspiracy for certain of the defendants and others to process, store, weigh, and package controlled substances for distribution.

It was part of this conspiracy for certain of the defendants and others to maintain premises for the purposes of storing, packaging, possessing, and distributing controlled substances.

It was part of this conspiracy for certain of the defendants and others to use and maintain motor vehicles to transport controlled substances, money, and/or co-conspirators, to facilitate drug transactions.

It was part of this conspiracy for certain of the defendants and others to use motor vehicles within which to conduct drug transactions and/or monetary transactions of drug proceeds.

It was part of this conspiracy for certain of the defendants and others to provide physical locations for conspirators to store, process and organize the distribution of controlled substances.

In furtherance of this conspiracy, and to effect and accomplish its objectives, the defendants and other co-conspirators committed one or more of the following overt acts:

Overt Acts

All factual allegations set forth in Counts 2 [REDACTED] of this Indictment are hereby incorporated by reference and re-alleged as overt acts in furtherance of the conspiracy alleged in Count 1. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the District of Oregon and elsewhere:

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1. [REDACTED]

[REDACTED]

[REDACTED]

2. [REDACTED]

[REDACTED]

[REDACTED]

3. [REDACTED]

[REDACTED]

[REDACTED]

4. On or about May 19, 2021, [REDACTED] and SHANE ANDERSON, agreed to distribute a mixture or substance containing a detectable amount of methamphetamine.

5. [REDACTED]

[REDACTED]

[REDACTED]

6. [REDACTED]

[REDACTED]

[REDACTED]

In violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A)(i, ii & viii), (b)(1)(B)(vi), 846.

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COUNT 2
(Possession with Intent to Distribute Methamphetamine)
(21 U.S.C. § 841(a)(1), (b)(1)(A)(viii))

On or about June 8, 2021, defendant **SHANE ANDERSON**, did knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A)(viii).

[REDACTED]

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FORFEITURE ALLEGATION

Upon conviction of any offense in Counts 1-3, defendants, [REDACTED]

[REDACTED], SHANE ANDERSON and [REDACTED]

[REDACTED], shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the aforesaid violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations.

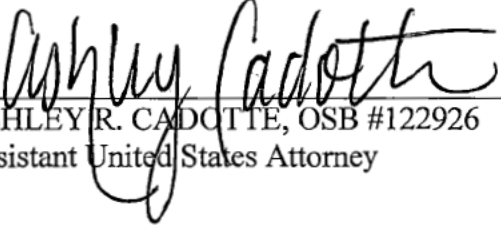
Dated: July 8th, 2021

A TRUE BILL.

[REDACTED]
OFFICIATING FOREPERSON

Presented by:

SCOTT ERIK ASPHUAG
Acting United States Attorney


ASHLEY R. CADOTTE, OSB #122926
Assistant United States Attorney